

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

FRANKLIN A. ROTHMAN
JEREMY SCHNEIDER
ROBERT A. SOLOWAY
DAVID STERN

Tel: (212) 571-5500
Fax: (212) 571-5507

RACHEL PERILLO

January 31, 2022

By ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Malek Mohammad Balouchzahi
21 Cr. 658 (JMF)

Dear Judge Furman:

Robert Soloway and I are the attorneys for Mr. Balouchzahi, the defendant in the above-named matter. I write with the consent of the government to request an adjournment of the current motion schedule by approximately sixty days. Currently, motions are due by February 18, 2022, oppositions are due by March 4, 2022, and replies are due by March 11, 2022. However, because we are still in the process of reviewing discovery, additional time is needed to determine if any defense motions will be made.

If an adjournment is granted, I respectfully propose the following motion schedule:

Motions due:	April 19, 2022
Oppositions due:	May 3, 2022
Replies due:	May 10, 2022

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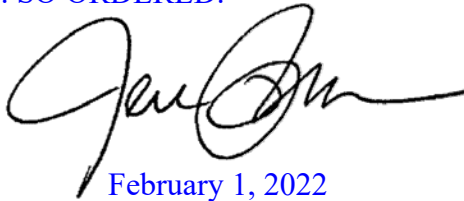
Mr. Balouchzehi consents to the exclusion of time under the Speedy Trial Act.

If the Court has any questions regarding this application please do not hesitate to contact me.

Respectfully submitted,
/s/
David Stern

cc: AUSA Kimberly Ravener
AUSA Michael Lockard

Application GRANTED. The motion schedule proposed by defense counsel is hereby adopted. The pretrial conference, currently scheduled for March 1, 2022, is adjourned to April 25, 2022, at 3:15 p.m.. Time is excluded in the interests of justice from today, February 1, 2022 until April 25, 2022 for the reasons set forth in defense counsel's letter. The Clerk of Court is directed to terminate Doc. #16. SO ORDERED.



February 1, 2022